## IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Application No.:      10/563,509
Applicants:          Tomohiro URYU et al.
Filing Date:         January 5, 2006
Title:               IMAGE SIGNAL PROCESSING DEVICE
T.C./A.U.:           2629
Examiner:            Randal L. Willis
Confirmation No.:    8639
Docket No.:          MAT-8791US

## REPLY BRIEF

**MAIL STOP APPEAL BRIEF - PATENTS**
Commissioner for Patents
P.O. Box 1450
Alexandria, VA  22313-1450

Sir:

In response to the Examiner's Answer of **May 19, 2011**, Appellants are submitting this Reply Brief for the above-identified application.

As recited in Appellants' claim 1, static data (data that does not need to be updated in every field) is divided into a plurality of reduced size data having a common size:

> **... the data that does not need to be updated in every field is <u>divided into a plurality of reduced size data having a common size corresponding to a length of the vertical blanking time period,</u> the plurality of reduced size data assigned to the plurality of fields respectively, and transferred.**

This feature is supported in Figs. 6A-6D and 7A-7E of your specification.

On page 10 of the Examiner's Answer, it is stated that it would be obvious to divide Miura's data block into a plurality of reduced size data packets having a common size (i.e. similar to asynchronous transfer mode (ATM) where data is divided into common sized data and transmitted) and then to reassemble the data block at the destination. Appellants respectfully disagree. Modifying Miura's system based on

ATM would increase the complexity of Miura's system, and hence would not be done by one of ordinary skill in the art.

In Figs. 4A and 4B, Miura (US 2004/0263496) suggests that the dynamic and static data are arranged in data blocks that are based on the type of data (e.g., video control data, life source control data and display mode control data).  Each of these blocks may have different block sizes (see paragraphs 62 and 63 of Miura).

As described in paragraphs 77-97 (and shown in Fig. 5) of Miura, the static control data is transferred in subsequent frames by transmitting each data block intact (i.e., the video control block (B0, B1 and B2) is transmitted intact in the first frame, the light source block (B3, B4 and B5) is transmitted intact in the second frame, and the display mode block (B6 and B7) is transmitted intact in the third frame).

Miura transmits the data blocks intact (i.e., Miura does not change the size of the data blocks).  This allows the receiver to process the intact data blocks without having to reassemble partial data (i.e., if the video control data block (B0, B1 and B2) is separated in two different frames, it will be more difficult for the receiver to reassemble the data block from the partial data).
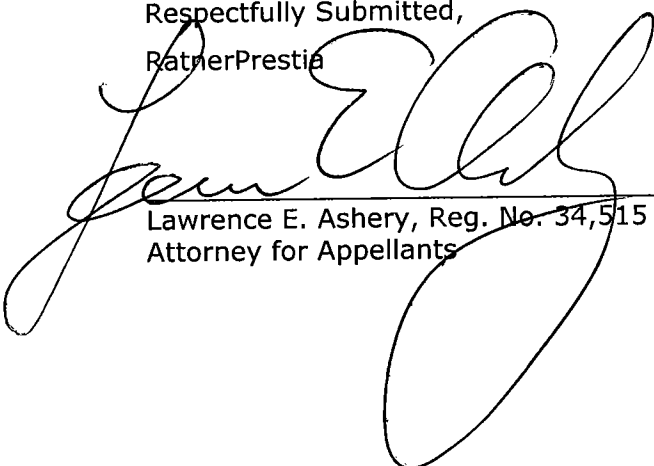
Furthermore, if the data blocks are divided and transmitted in two different frames, the transmitter would have to include additional header data instructing the receiver on how to reassemble the data block.  Thus, it would not be obvious to one of ordinary skill in the art to modify Miura's system to divide up the static control data into data blocks of common size (i.e., it is easier for Miura's system to divide the blocks based on the type of data rather than based on a common size).

For the reasons set forth above, reversal of the current rejection is respectfully requested.

Respectfully Submitted,

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